REMARKS

[0003] Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1, 3-15, 19-23, 27-33, 36-39, and 42-48 are presently pending. Claims amended herein are 1, 7, 15, 23, 33, 36-39, 42-46, and 48. Claims withdrawn or cancelled herein are 2, 16-18, 24-26, 34-35, and 40-41. New claims added herein are none.

Statement of Substance of Interview

[0004] The Examiner graciously spoke with me—the undersigned representative for the Applicant—on August 21, 2007. Applicant greatly appreciates the Examiner's willingness to talk. Such willingness is invaluable to both of us in our common goal of an expedited prosecution of this patent application.

[0005] During the interview, I discussed how the claims differed from the cited art. Without conceding the propriety of the rejections and in the interest of expediting prosecution, I also proposed several possible clarifying amendments.

[0006] The Examiner was receptive to the proposals, and I understood the Examiner to indicate that the proposed clarifying claim amendments were advancing prosecution. The Examiner indicated that the proposals overcame the § 101 rejections. However, the Examiner indicated that he would need to review the cited art again and/or do another search, and requested that the proposed amendments be presented in writing.

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[0007]   Applicant herein amends the claims in the manner discussed during the interview. Accordingly, Applicant submits that the pending claims are allowable over the cited art of record for at least the reasons discussed during the interview.

Formal Request for an Interview

[0008]   If the Examiner's reply to this communication is anything other than allowance of all pending claims, then I formally request an interview with the Examiner. I encourage the Examiner to call me—the undersigned representative for the Applicant— so that we can talk about this matter so as to resolve any outstanding issues quickly and efficiently over the phone.

[0009]   Please contact me or my assistant to schedule a date and time for a telephone interview that is most convenient for both of us. While email works great for us, I welcome your call to either of us as well. Our contact information may be found on the last page of this response.

Claim Amendments

[0010]   Without conceding the propriety of the rejections herein and in the interest of expediting prosecution, Applicant amends claims 1, 7, 15, 23, 33, 36-39, 42-46, and 48 herein. Applicant amends claims to clarify claimed features in accordance with our telephone discussion with the Examiners. Such amendments are made to expedite prosecution and quickly identify allowable subject matter. Such amendments are merely intended to clarify the claimed features, and should not be construed as further limiting the claimed invention in response to cited prior art.

Substantive Matters

Claim Rejections under § 101

[0011]   Claims 33-48 are rejected under 35 U.S.C. § 101. Although claim numbers were inadvertently omitted from the Office Action dated May 3, 2007, in light of the discussion during the above mentioned Examiner interview and the amendments presented herein, Applicant respectfully submits that these claims comply with the patentability requirements of § 101 and that the § 101 rejections should be withdrawn. The Applicant further asserts that these claims are allowable. Accordingly, Applicant asks the Examiner to withdraw these rejections.

[0012]   If the Examiner maintains the rejection of these claims, then the Applicant requests additional guidance as to what is necessary to overcome the rejection.

Claim Rejections under § 103

[0013]   Claims 1-48 are rejected under 35 U.S.C. § 103. In light of the amendments presented herein and the decisions/agreements reached during the above-discussed Examiner interview, Applicant submits that these rejections are moot. Accordingly, Applicant asks the Examiner to withdraw these rejections.

[0014]   The Examiner rejects claims 1-48 under § 103. For the reasons set forth below, the Examiner has not shown made a prima facie case showing that the rejected claims are obvious.

[0015]   Accordingly, Applicant respectfully requests that the § 103 rejections be withdrawn and the case be passed along to issuance.

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[0016]   The Examiner's rejections are based upon the following references in combination:

- **Boylan**: *Boylan, et al.,* US Patent App. Pub. No. 2006/0288366 (published Dec. 21, 2006);
- **Buehl**: *Buehl*, US Patent No. 5,912,696 (issued Jun. 15, 1999);
- **Newlin**: *Newlin, et al.*, US Patent No. 6,636,211 (issued Jun. 3, 1997);
- **Dubal**: *Dubal, et al.*, US Patent No. 6,711,630 (issued Mar. 23, 2004);
- **WMEOS**: Windows Millennium Edition Operating System; *Understanding Universal Plug and Play.* Redmond, WA, USA: white paper (2000).

Overview of the Application

[0017]   The Application describes a technology for a method, system, and apparatus which allow a user to tune the content presented on an intelligent information presentation appliance. In addition, the Application describes a method, system, and apparatus which allow appliances that traditionally acted as devices to act as control points within the Universal Plug and Play (UPnP) network structure. Furthermore, the Application describes a method, system, and apparatus which allow the definition of a device or a control point within the UPnP network structure to be extended via an extensible markup language such as XML.

[0018]   The Application provides a tuning capability for information presentation appliances by extending the definition of the appliance, whether it is an UPnP device or control point. The appliance can contain a user interface, in either hardware or software, for tuning the information presented by the appliance.

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[0019]   An extension to a standardized XML schema is presented, wherein the additional elements represent categories of information from which the user can select. In such a manner, the user's tuning can be transmitted through XML pages which remain backwards compatible. If the appliance is a control point, the user's tuning can be detected and represented in an extended XML schema so that the control point can instruct information sources, such as compatible Internet radio station servers or image servers, to send only specific categories of information reflecting the user's tuning. If the appliance is a device, it can advertise its methods, through an extended XML schema, as being capable of presenting only those categories of information reflecting the user's tuning. To devices and control points which do not contain the functionality of the present Application, the extensions to the XML schemas contemplated by the present invention are ignored, thereby ensuring backwards compatibility with older devices.

[0020]   In short, the Application presents an UPnP architecture of devices and control points that can automatically integrate themselves into a network and provide functionality to a user. Extensions are provided that allow an information presentation appliance to identify categories of information the user wishes that appliance to display. The appliance, acting as a device, can advertise functionality that only allows for the display of information that matches the categories selected by the user. Alternatively, the appliance can act as a control point and request information from information storage devices that matches the categories selected by the user. Using either alternative, the user is allowed to tune, at the appliance, the information that the appliance presents.

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Cited References

[0021]   The Examiner cites Boylan as its primary reference in obviousness-based rejections. The Examiner cites alternately Buehl or Newlin as secondary references and Newlin or WMEOS as tertiary references; WMEOS as a quaternary reference and Dubal as a quinary reference in obviousness-based rejections.

Boylan

[0022]   Boylan describes a technology for a program guide system in which local advertisements may be distributed to interactive television program guides implemented on the user television equipment associated with a television distribution facility such as a cable system headend. The local advertisements contain information that is directed toward the particular users in a local area. The local advertisements may be displayed when a user selects a related global advertisement. The local advertisements may also be displayed automatically by cycling global advertisements and local advertisements. Advertisements may be blocked based on content or time shifted. Policies regarding advertisement usage may be enforced.

Buehl

[0023]   Buehl describes a technology for an adaptive multidimensional media asset rating system and method for selective play of a media asset includes an N-dimensional rating vector encoded into the leader portion or meta-data portion of a media asset. This N dimensional rating vector has a magnitude value for each of the N dimensions and is assigned to each asset by the asset producer. A user programmable asset filter system, responsive to the encoded vector, is incorporated into or added on to the media asset

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playing device. The rating vector is then read from the asset by the filter system in or connected to the media asset playing device such as a TV, videotape recorder/player, radio receiver CD player, or other reception device prior to processing the asset for viewing. The user programs into the filter system coupled to the asset player or reception device a threshold N dimensional preference vector which has a magnitude value for each of the N dimensions. The reception or playing device uses the filter system to block or play the incoming asset based on comparison of the preference vector to the rating vector.

Newlin

[0024]   Newlin describes a technology for a universal multimedia access apparatus for accessing any of a plurality of multimedia applications provided by a multimedia network. The universal multimedia access apparatus accesses a predetermined one of the plurality of multimedia applications using an application-specific module interfaced thereto, the application-specific module being selected from a plurality of application-specific modules. The universal multimedia access apparatus comprises a transceiver and a processing unit. The transceiver communicates multimedia information between the multimedia network and the application-specific module, and communicates with the multimedia network in any one of a plurality of communication modes. The processing unit is operative to identify the application-specific module interfaced thereto and the predetermined one of the plurality of multimedia applications associated with the application-specific module, and operative to command the transceiver to communicate with the multimedia network in a mode associated with the predetermined one of the plurality of multimedia applications.

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Dubal

[0025]   Dubal describes a technology for a method and apparatus for communicating with a plug and play device, for example, a network adapter comprising, searching a system registry for an identity corresponding with a plug and play device; obtaining a symbolic link list corresponding with the identity obtained from the registry; obtaining a pointer to a device object corresponding with a symbolic link in the symbolic link list; and using the device object to obtain information about the plug and play device. The information obtained may then be used to communicate with the plug and play device.

WMEOS

[0026]   WMEOS is a white paper providing an overview on the topic of Universal Plug and Play and how it works.

Obviousness Rejections

Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)

[0027]   Applicant disagrees with the Examiner's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a prima facie case have not been met.

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Based upon Boylan and Buehl and Newlin and WMEOS

[0028] The Examiner rejects claims 1-11, 15-29, 33-43, 47 and 48 under 35 U.S.C. § 103(a) as being unpatentable over Boylan in view of Buehl in view of Newlin in view of WMEOS. Applicant respectfully traverses the rejection of these claims and asks the Examiner to withdraw the rejections of these claims.

Based upon Boylan and Buehl and Newlin and WMEOS and Dubal

[0029] The Examiner rejects claims 12-14, 30-32 and 44-46 under 35 U.S.C. § 103(a) as being unpatentable over Boylan in view of Buehl in view of Newlin in view of WMEOS in view of Dubal. Applicant respectfully traverses the rejection of these claims and asks the Examiner to withdraw the rejections of these claims.

Independent Claims 1, 7, 15, 23, 33, and 39

[0030] The Examiner indicates (Action, p. 3-5) the following with regard to these claims:

> With regard to claims 1, 7, 15, 23, 33, and 39, Boylan teaches a method for tuning an information presentation appliance (advertisement program in a set top box) in a network environment (see paragraphs 54, 77, and 78). Boylan further teaches receiving user input specifying keyword for a particular category of information to be presented to a user (see paragraph 80). Boylan further teaches receiving user input specifying keywords related to categories of information to be blocked from display (see paragraph 79). Boylan teaches, the advertisements having content tags specifying the type of data included in the advertisement (see paragraph 77), and a bidirectional communication path between the Television Distribution Facility [52] and the Set Top

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Box [54] where the Set Top Box provides the restrictions to the Television Distribution Facility which filters the advertisements, but doesn't specifically teach device description pages, containing categories of information to be presented, using a markup language.

Buehl teaches set top box for creating restriction on the type of media to be transmitted to it (see column 2, lines 15-30), similar to that of Boylan, but further teaches storing a preference vector describing the permissible media (see column 4, line 66 through column 5, line 15 and column 7, lines 1-35). It would have been obvious to one of ordinary skill in the art, having the teachings of Boylan and Buehl before him at the time the invention was made to modify the set top box content restricting system of Boylan to create and save a preference file, as did Buehl. One would have been motivated to make such a combination because this provides an organized means for storing all the content restrictive data. Boylan and Buehl, however, don't explicitly state network communication via a markup language.

Newlin teaches a set top box for creating restriction on the type of media to be transmitted to it (see column 7, line 62 through column 8, line 14), but further teaches communication between apparatuses being via Plug-and -Play on a network of universal media access (see column 8, lines 55-65). MS teaches utilizing Plug-and-Play for audio/video entertainment and defines the Universal Plug-and-Play standard stating that communication is via Internet standards with XML device description documents (see page 2 paragraph 2 and page 11 paragraph 2). It would have been obvious to one of ordinary skill in the art, having the teachings of Boylan, Buehl, Newlin, and MS before him at the time the invention was made to modify the set top box content restricting system of Boylan and Buehl to include the transmission via a markup language as done by Newlin and MS. One would have been motivated to make such a combination because markup language is the standard for communication over a network between diverse systems.

[0031]   Applicant submits that the obviousness rejections are not valid because, for each rejected claim, no combination of references discloses each and every element of that

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rejected claim. Furthermore, the elements disclosed in the references are not combinable in the manner recited by each rejected claim.

[0032] The Examiner's rejections do not address each element of the claims. For example, (from claim 1 as amended, with emphasis added):

- receiving user input . . . selecting at least one category of information to be presented on the appliance, wherein the at least one category comprises **user-defined keywords and blocked keywords created and entered by the user** to further specify the category selection and aid in identifying the category **if there is no match to the category selection within the inter-appliance communication network**; . . .

[0033] Boylan neither teaches nor suggests a method or means for a user to define, create and enter keywords such as the names of family members, e.g., Mom, Dad, Mike, and Amy, or the names of friends, e.g., Sarah, Julie, Doug, and Sue (Applicant's Specification, page 27, example device description page of Table 4; Fig. 7). Rather, Boylan generally describes filtering advertisements from being shown on television equipment. While Boylan discloses that "user television equipment may block advertisements based on a keyword search, . . . rather than relying on content tags provided at [a] main facility. . . [by] the user, system operator, or other entity . . . select[ing] the blocking (filtering) criteria to be used," (Boylan [0079] and [0080]), Boylan's selecting does not teach or suggest that each user has the ability to **define** and **create** their own **keywords** "if there is no match to the category selection within the inter-appliance communication network" as is claimed.

[0034] Boylan's disclosure is limited to blocking or allowing advertising based on "words . . . in the text of the advertisement or for words based on an item of interest." While Boylan uses the term *keyword* those *keywords* are neither user-defined nor

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created—the examples provided are "graphic language," "adult programming," and "electronic equipment," none of which contemplate the user-defined and created keywords of this claim.

[0035]   None of the myriad of additional cited references remedies this deficiency of Boylan. Thus, for at least this reason, Applicant respectfully submits that these claims are not obvious and respectfully requests that these rejections be withdrawn, and this matter passed along to issuance.

[0036]   Applicant further submits that, in addition to the previously claimed features addressed above, the references fail to teach the following clarifying features claimed herein:

- facilitating in an inter-appliance communication network, **configuring** at least one of a plurality of information presentation appliances which were **defined as Universal Plug and Play (UPnP) compliant devices to act as control points**, wherein a UPnP device advertises its abilities and is controlled by a control point, while a control point listens or searches for devices it is capable of controlling and exerts control over those devices, wherein at least one of the plurality of information presentation appliances facilitates disparate types of presentations, wherein disparate types of presentations include **audio** and **still images**, wherein the information presentation appliance is selected from the group comprising an **electronic picture frame** or a **speaker**;

- . . .

- **transmitting** the device description page with the data representing the categories of information and the **user-defined and created keywords from the** at least one of the plurality of **information presentation appliances** via the inter-appliance communication network

[0037]   These features are supported by the Specification at least at pages 3, 7, 15

and 22, (quoted below for convenience with emphasis added):

> The present invention, therefore, is directed to a method, system, and apparatus which **allow a user to tune the content presented on an intelligent information presentation appliance**. The present invention is also directed to a method, system, and apparatus which **allow appliances that traditionally acted as devices to act as control points within the UPnP network structure**. The present invention is additionally directed to a method, system, and apparatus which allow the definition of a device or a control point within the UPnP network structure to be extended via an extensible markup language such as XML. (Spec. p. 3, Summary responding to problem of presented in the Background)
> . . .
> Figure 1 illustrates an example of an intelligent appliance for use with the present invention. An information presentation appliance 1 can either present information to a user through a video device 2 or a sound device 3. The video device can be a television, an LCD panel, an **EPF**, a projection screen, or the like. Similarly, the sound device 3 can be a **speaker**, a stereo system, a radio, or other sound transducer. While it is possible that a single information presentation appliance I can have both audio and video output, such as a television set, it is also contemplated that the information presentation-appliance can have only one, such as a simple, low-cost, EPF. (Spec. p. 7)
> . . .
> As will be known by those of skill in the art, **the UPO Architecture, as expressed in The Universal Plug and Play Device Architecture Version 1.0, incorporated herein by reference in its entirety, defines UPnP compliant appliances as either "devices" or "control points."** A UPnP device advertises its abilities and is controlled by a control point, while a control point listens or searches for devices it is capable of controlling. (Spec. p. 15)
> . . .
> In accordance with another important aspect of the invention, information presentation **appliances which traditionally behaved as devices within the UPnP architecture can act as control points**, allowing the information presentation appliance **greater flexibility in presenting categories of information to a user and allowing the user to tune the information presented through the appliance acting as a control point.** An information presentation appliance, such as an EPF, a stereo, or a printer, is generally a device under the UPnP architecture because it is controlled by a

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control point that feeds, or pushes, to the information presentation appliance, the information that the appliance is to present, including images, sound, or hard copy output. The present invention contemplates the information presentation appliance as a control point within the UPnP architecture, enabling it to request information from information storage appliances and servers, which, in turn, would be devices within the UPnP architecture. In this manner the information is pulled, or fetched, by the information presentation appliance, rather than being pushed to it. (Spec. p. 22)

[0038]   Thus, for these additional reasons as supported by the Specification and as discussed in the above mentioned Examiner interview, Applicant asks the Examiner to withdraw the rejections of these claims.

No Reason to Combine References

[0039]   The Examiner admits that Boylan does not teach "creating a device description page using a markup language; storing data representing the categories of information specified by the user and the user-defined keyword entered by the user in the device description page", as recited in this claim.

[0040]   Without agreeing or disagreeing regarding any of the cited references disclosing what they are purported to disclose, Applicant notes that, for example, *set top box for creating restriction on the type of media to be transmitted to it, storing a preference vector*, and *network communication via a markup language* is not what is claimed.

[0041]   The Examiner relies on Buehl, Newlin and WMEOS to remedy the deficiency of Boylan. On page 4 of the Action, the Examiner states that it would have been obvious "to modify the set top box content restricting system of Boylan to create

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and save a preference file, as did Buehl," and "[o]ne would have been motivated to make such a combination because this provides an organized means for storing all the content restrictive data." The Examiner then further admits that Boylan and Buehl do not teach *network communication via a markup language*.

[0042]   The Examiner next relies on Newlin and WMEOS. On page 4-5 of the Action, the Examiner states that it would have been obvious "to modify the set top box content restricting system of Boylan and Buehl to include transmission via a markup language as done by Newlin and MS [WMEOS]" and "[o]ne would have been motivated to make such a combination because markup language is the standard for communication over a network between diverse systems."

[0043]   It appears that Applicant's disclosure provided the reason to attempt to combine the cited references; however, at least since none of the above references teach or suggest all of the elements of these claims, there exists no reasonable evidence to combine these references in this way.

[0044]   "[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness," KSR Int'l Corp. v. Teleflex, Inc., Slip Op. at 14 (U.S. Apr. 30, 2007) (quoting In re Kahn, 441 F. 3d 977, 988 (CA Fed. 2006)).

[0045]   Applicant submits that Examiner has not identified some suggestion, teaching, or reason from the cited references themselves (or from the knowledge of one of ordinary skill in the art) that would have led one of ordinary skill in the art at the time

of the invention (hereinafter, "OOSA") to combine the disclosures of the cited references in the manner claimed. More specifically, there is no motivation to combine because:

- although the references can be combined or modified, the cited art does not suggest the desirability of such combination/modification;
- the Examiner has not provided any objective and particular evidence showing why OOSA would be motivated to combine the teachings of the two references.

[0046] Accordingly, the Applicant therefore respectfully asks the Examiner to withdraw the rejection of these claims.

No Reasonable Evidence to Combine: Cited References Express no Reason to Combine

[0047] Applicant submits OOSA would have no reason to combine the teachings of Boylan and Buehl and Newlin and WMEOS because none of the reference expresses a reason to combine the teachings of these references, either explicitly or implicitly.

[0048] Applicant submits that because Boylan and Buehl disclose set top box content restricting systems, but do not suggest "creating a device description page using a markup language; storing data representing the categories of information specified by the user and the user-defined keyword entered by the user in the device description page," OOSA would have no reason to look to Newlin and WMEOS.

[0049] The above statement is draws on the reasoning of the BPAI presented in *Ex parte* Rinkevich (non-precedential decision) on May 29, 2007.

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[0050] In its reasoning, the BPAI stated: "[a] factfinder should be aware, or course, of the distortion caused by hindsight bias and must be cautious of argument reliant upon *ex post* reasoning," (quoting KSR Int'l Co. v. Teleflex Inc., 127 S. Ct. 1727, 82 USPQ2d at 1397. *See also* Graham v. John Deere Co., 383 U.S. at 36, 148 USPQ at 474). In that case, as in the matter as issue here, the Applicant raised the issue of improper hindsight reasoning. Therein the BPAI was persuaded that the problem or deficiency that the Examiner raised as motivation to seek out a secondary reference, "impermissibly used the instant claims as a guide or roadmap in formulating the rejection." The BPAI further quoted the Supreme Court in *KSR* stating that "[r]igid preventative rules that deny factfinders recourse to common sense, however, are neither necessary under our case law nor consistent with it," KSR Int'l Co. v. Teleflex Inc., 127 S. Ct. 1727, 82 USPQ2d at 1397. Applying common sense to the case at hand, the BPAI concluded that "a person of ordinary skill in the art *having common sense* at the time of the invention would not have reasonably looked to Wu to solve a problem already solved by Savill," (emphasis provided). Ultimately the BPAI found that the Examiner had impermissibly used the claims has a guide to formulate the rejection.

[0051] As in *Ex parte* Rinkevich, Applicant submits OOSA would have no reason to combine the teachings of Boylan with Buehl and Newlin and WMEOS because the references do not express a reason to combine the teachings of these references, either explicitly or implicitly.

[0052] At p. 4-5 of the Action, the Examiner suggests that the reason to combine the teaching of Boylan and Buehl and Newlin is that Newlin teaches a set top box for creating restriction on the type of media to be transmitted to it. However, because Boylan and Buehl already address restricting set top box content, OOSA *having common sense*

would not have reasonably looked to Newlin for such teaching since Boylan and Buehl had already addressed the problem.

[0053]   Additionally, at p. 4-5 of the Action, the Examiner suggests that the reason to combine the teaching of Boylan and Buehl and Newlin and WMEOS is that WMEOS teaches a set top utilizing Plug-and Play for audio/video entertainment. However, because Newlin already addresses Plug-and Play, OOSA *having common sense* would not have reasonably looked to WMEOS for such teaching since Newlin had already addressed the problem.

[0054]   Similar to *Ex parte* Rinkevich, Applicant submits OOSA would have no reason to combine the teachings of Boylan and Buehl and Newlin and WMEOS because the references do not express a reason to combine the teachings of these references, either explicitly or implicitly.

[0055]   For the foregoing reasons, Applicant submits that none of the references express a reason to combine the teachings of these references. Accordingly, OOSA would have no reason to combine the teachings of the cited references.

No Reason to Combine; No Showing of Objective Evidence

[0056]   Furthermore, Applicant respectfully submits that the Examiner has not met his burden in showing a reason to combine Boylan and Buehl and Newlin and WMEOS. More specifically, as discussed above, the Examiner has not identified any objective and particular evidence found in the cited references that show why OOSA would reasonably look to combine the teachings of each of the cited references.

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[0057]   In light of *Ex parte* Rinkevich, the Examiner has not identified any specific portion of the cited references as being objective and particular evidence that would have prompted OOSA to look towards the teachings of the other to produce the combination of references that the Examiner proposes. Applicant respectfully submits that the Examiner cannot maintain this obviousness-based rejection without pointing out, with particularity, the specific portions of the cited references that would have prompted OOSA to look towards the teachings of the other to produce the combination of references that the Examiner proposes.

[0058]   For the foregoing reasons, Applicant submits that the Examiner has not met his burden in showing objective evidence to combine references. Accordingly, OOSA would have no reason to combine the teachings of cited references.

[0059]   In sum, Applicant submits that there is no suggestion or teaching given by one reference that would prompt OOSA to combine it with the teachings of the other reference. More specifically, there is no reason to combine because no rationale exists in the references themselves to make the combination; and the Examiner has not provided any objective and particular evidence showing why OOSA would have a reason to combine the teachings of the two references.

[0060]   As shown above, the combination of Boylan and Buehl and Newlin and WMEOS do not disclose all of the claimed elements and features of these claims. Accordingly, Applicant asks the Examiner to withdraw the rejection of these claims.

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Dependent Claims 2-6, 8-14, 16-22, 24-32, 34-38, and 40-48

[0061]   These claims ultimately depend upon independent claims 1, 7, 15, 23, 33, and 39. As discussed above, claims 1, 7, 15, 23, 33, and 39 are allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons. Applicant respectfully requests that the Examiner withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

[0062]   All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the **Examiner is urged to contact me before issuing a subsequent Action**. Please call/email me or my assistant at your convenience.

Respectfully Submitted,

Dated: _08/30/2007_   By: _____

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RESPONSE TO NON-FINAL OFFICE ACTION

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